

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada
Nevada Bar Number 14853
ANDREW W. DUNCAN
Assistant United States Attorney
Nevada Bar Number 14702
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Phone: (702) 388-6336
Andrew.Duncan@usdoj.gov
Attorneys for the United States of America

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIELA TITO AND JACK PAUL
MCLAUGHLIN,
Defendants.

Case No.: 2:21-cr-00082-GMN-EJY

**Stipulation for Extension of Time
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, United States Attorney, and Andrew W. Duncan, Assistant United States Attorney, counsel for the United States of America, Thomas F. Pitaro, counsel for defendant Daniela Tito, and James Oronoz, counsel for Defendant Jack Paul McLaughlin, that the date for the Government to file a response to the Defendant's Motion to Suppress (ECF No. 47) be extended for twenty one days, specifically to **April 11, 2022**.

This stipulation is entered for the following reasons:

1. The Defendant's Motion to Suppress was filed and served on March 7, 2022. *See* ECF No. 47. The Government's response deadline is presently March 21, 2022.

2. Government Counsel was out of the District and unable to have sufficient time to conduct investigation into the issues raised in the Motion.
3. Government Counsel needs additional time to conduct investigation and research to adequately respond to the Defendant's motion.
4. The parties need additional time to attempt to resolve the matter without litigating pre-trial motions.
5. The additional time requested herein is not sought for purposes of delay, but to allow counsel for the Government time to adequately respond to the Defendant's motion.
6. Additionally, denial of this request for continuance could result in a miscarriage of justice.
7. This is the first stipulation filed herein to continue the Government's response deadline.
8. The parties agree to the extension of time.

DATED: March 18, 2022

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Andrew W. Duncan

ANDREW W. DUNCAN
Assistant United States Attorney

/s/ Thomas F. Pitaro

THOMAS F. PITARO
Counsel for Defendant
Daniela Tito

/s/ James Oronoz

JAMES ORONOS
Counsel for Defendant
Jack Paul McLaughlin

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:21-cr-00082-GMN-EJY
)	
Plaintiff,)	
)	
v.)	
)	
DANIELA TITO AND JACK PAUL)	
MCLAUGHLIN)	
)	
Defendants.)	
_____)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion to Suppress was filed and served on March 7, 2022. *See* ECF No. 47. The Government's response deadline is presently March 21, 2022.
2. Government Counsel was out of the District and unable to have sufficient time to conduct investigation into the issues raised in the Motion.
3. Government Counsel needs additional time to conduct investigation and research to adequately respond to the Defendant's motion.
4. The parties need additional time to attempt to resolve the matter without litigating pre-trial motions.

